

Appendix A – Undisputed RFPs Implicating the Definition of “Online Media & Communications Services”

RFP No.	Operative Request
51	All Documents relating to Students’ use of Online Media & Communications Services, including: a. Communications with and among members of the School District’s governing board or body relating to Students’ or teachers’ use of Online Media & Communications Services at school, during school hours or on school property; b. Communications with and among employees of the School District relating to Students’ or teachers’ use of Online Media & Communications Services at school, during school hours or on school property; c. Communications between the School District and Students or Students’ parents relating to Students’ or teachers’ use of Online Media & Communications Services at school, during school hours or on school property; d. Communications between the School District and third parties relating to Students’ or teachers’ use of Online Media & Communications Services.
52	All Documents relating to any complaints You have made or received, lodged or reported relating to Students’ or teachers’ use of Online Media & Communications Services.
53	All Documents related to Students’ participation in challenges, pranks, or campaigns on Online Media & Communications Services, including but not limited to, Documents relating to any disciplinary measures taken by You as a result of Students’ participation in such challenges, pranks, or campaigns on Online Media & Communications Services.
54	All Documents relating to any research, investigation, studies, surveys, reports, evaluations, initiatives, or analyses undertaken by You, or on Your behalf, or at Your direction concerning Online Media & Communications Services, including Students’ or teachers’ use of Online Media & Communications Services.
57	All Documents discussing the impact of Online Media & Communications Services on Your schools and Students.
58	All Documents relating to the rules imposed by each school in the School District related to Students’ or teachers’ use of Online Media & Communication Services.
59	Documents sufficient to show Your use of Online Media & Communications Services to communicate with Students, Students’ parents or family members, or the local community, including but not limited to documents sufficient to identify any accounts You maintain on any of Defendants’ services.
60	All Documents relating to social media accounts associated with You or Your individual schools, including Documents sufficient to show all schools’ or school-affiliated organizations’ accounts on Online Media & Communications Services.

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61	All Documents related to Your use of Online Media & Communications Services to create and/or share lesson plans, resources, videos, podcasts, audio recordings, and/or materials to enhance Student learning.
62	Documents sufficient to show Your use of Online Media & Communications Services to create and/or share assignments, quizzes, and other classroom-related work or activities with Students.
63	Documents sufficient to show Your use of Online Media & Communications Services to track Student progress, grade work, provide feedback to Students or parents, monitor remote learning, and/or provide additional learning support for Students.
65	<p>All Documents discussing, reflecting or relating to any expenditures, losses, or alleged damages that You contend are attributable to any use of Online Media & Communications Services, including but not limited to the following alleged harms (See Master Compl., Dkt. 504, 212):</p> <ul style="list-style-type: none"> a. Expending, diverting, and increasing resources and increasing staff time to confiscate cell phones and other devices; b. Hiring and retaining additional counselors, staff, and personnel in response to increased mental health and behavioral issues allegedly caused by Students’ use of Online Media & Communications Services; c. Expending, diverting, and increasing resources to repair property damaged as a result of Students’ alleged addiction to Online Media & Communications Services and compulsive participation in challenges on Online Media & Communications Services that direct destruction or theft of school property; d. Expending, diverting, and increasing resources to repair property damaged as a result of Students acting out because of mental, social, and emotional problems Defendants’ conduct caused; e. Expending, diverting, and increasing time and resources, and increasing staff, to communicate and engage with parents and guardians of Students regarding youth social, emotional, or behavioral health issues, and attendance problems; f. Expending, diverting, and increasing resources to investigate and respond to threats made against schools and Students via Online Media & Communications Services that are allegedly pushed by Defendants’ platforms to drive user engagement; g. Expending, diverting and increasing resources to add additional information technology resources in an attempt limit Students’ access to Online Media & Communications Services and mitigate risks posed by Students’ social media use; h. Investing in physical barriers (such as magnetic pouches) to keep Students from accessing Online Media & Communications Services on school property; i. Developing new and revised teaching plans to address Students’ altered learning habits, e.g., reduced attention span, inability to communicate effectively; j. Providing additional learning support to address Students’ declining achievement, e.g., after school support, as a result of the allegedly negative impact of problematic the use of Online Media & Communications Services on Students’ ability and capacity to learn; k. Hiring additional mental health personnel;

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	<p>l. Expending and diverting resources and increasing staff to address Student discipline issues caused by Defendants’ attracting and allegedly addicting Students to their Online Media & Communications Services;</p> <p>m. Expending, diverting and increasing resources for modifications to mental health curricula;</p> <p>n. Expending, diverting, and increasing resources to create education materials or youth, parents, and staff addressing social media addiction and harm;</p> <p>o. Expending and diverting time and resources, and increasing staff, to route Students and youth to counselors and mental health service providers;</p> <p>p. Expending, diverting, and increasing resources to develop additional mental health resources;</p> <p>q. Training teachers to help Students with their mental, social, emotional, or behavioral health and expending, and diverting time and resources to increase staff and train staff to identify Students and youth exhibiting symptoms of mental, social, emotional, or behavioral health issues;</p> <p>r. Expending, diverting, and increasing resources to update student handbooks and similar materials to address use of Defendants’ platforms; and,</p> <p>s. Expending, diverting, and increasing resources to update school policies to address use of Defendants’ platforms.</p>
66	All Documents discussing, reflecting or relating to any Alleged Harm, including all records of expenditures, that You contend are attributable to use of Online Media & Communications Services.
67	All Documents relating to property damage, classroom disruptions or any disciplinary actions allegedly caused by Students’ use of Online Media & Communications Services.
68	All Documents discussing, reflecting or relating to Your expenditures related to Students’ or teachers’ use Online Media & Communications Services or cellphones.
71	All Documents relating to any complaints or requests You have received from any counselor, therapist, social worker, or teacher employed or funded by You, to provide additional services, funds, and/or resources to address Student use of Online Media & Communications Services.
75	All Documents constituting, memorializing or reflecting any non-privileged communications sent or received by You or any of your employees or representatives regarding any of the Defendants or Online Media & Communications Services.